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June 12, 2023

VIA ECF

Hon. John P. Cronan
United States District Court
Daniel P. Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

**Re: United States v. James Dermot McGonnell
Docket No. 06 Cr. 1197 (JPC)**

Dear Judge Cronan:

I represent Defendant in the above matter and write to request a further 30-day extension of Defendant's time to oppose the government's pending motion for a Preliminary Order of Forfeiture as to Substitute Assets. Dkt. 51. Defendant's opposition is presently due on June 12, 2023. Dkt. 59. Since the last request, considerable progress has been made in addressing the issues raised by the motion. In particular, the property mentioned in my prior letter to the Court dated May 12, 2023, Dkt. 58, has been sold and Defendant's share of the proceeds placed in escrow. However, some issues remain to be resolved, including the correct amount of tax payable on the proceeds and the effect of the plea agreement in November 2007 between Defendant and the government on the disposition of the balance. The latter issue has been complicated by the fact that the parties have been unable thus far to locate a copy of the agreement. Nonetheless, we are hopeful that the matter will soon be finalized. The government consents to this request.

I thank the Court for its attention to this matter.


Respectfully,

Niall MacGiollabhui
Niall MacGiollabhui

cc: AUSA Tara LaMorte

The request is granted. Mr. McGonnell shall oppose the Government's motion by July 12, 2023.

SO ORDERED.
Date: June 13, 2023
New York, New York


JOHN P. CRONAN
United States District Judge